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MATTER NO.

296-001

May 10, 2023

VIA CM/ECF

Hon. Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

RE: Flynn v. Cable News Network, Inc.
Case 1:21-cv-02587 (GHW/SLC)

Dear Judge Cave:

I represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter.

I respectfully request an extension of the parties’ expert discovery deadlines.

On April 20, 2023, the Court granted the parties’ requested extension of the expert discovery schedule, and, *inter alia*, ordered that “[b]y **May 24 2023**, the parties shall serve their expert disclosures”. [*ECF No. 134*].

The Flynnns’ expert has traveling extensively throughout Europe and the Middle East on business since April 18, and while she thought she would be able to comfortably complete her report by May 24, she needs more time. She is currently teaching at the United Nations Office of Counter-Terrorism Behavioral Insights Academy in Doha, Qatar, and from there she is flying to a conference in Poland. She has other personal and professional commitments in the United States through May 26.

In light of the unexpected circumstances, the Flynnns respectfully request additional time until June 5, 2023 to serve their expert report.

Extending the expert discovery schedule will not interfere with any other deadlines in the case, and no prejudice of any kind will result to any party.

The Flynnns request an extension of the parties' expert discovery deadlines to the following dates:

- ☐ **June 5, 2023:** Deadline to exchange expert disclosures;
- ☐ **June 20, 2023:** Deadline to exchange rebuttal expert disclosures;
- ☐ **July 7, 2023:** Deadline to complete expert depositions and complete expert discovery;
- ☐ **July 14, 2023:** Deadline to file a joint letter certifying that all discovery is complete, and advising they request a settlement conference with the Court.

Certification

Plaintiffs hereby certify that a good faith conference took place between counsel for the parties. Counsel met and conferred via emails exchanged on May 6, 2023 and May 9, 2023. Steven Biss and Katherine Bolger participated. In response to Plaintiffs' request for an extension, counsel for CNN advises that "We would like to keep things on track." No resolution has been reached. Counsel for the Plaintiffs believes the parties to be at an impasse and requests a conference with the Court.

Yours very truly,

/s/ Steven S. Biss

Steven S. Biss

cc. Anthony C. Carlini, Jr., Esq.
Counsel of Record (via email)